IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

TQ DELTA, LLC,	§
Plaintiff,	§
	§ JURY TRIAL DEMANDED
V.	§
	§
COMMSCOPE HOLDING COMPANY,	§
INC., COMMSCOPE INC., ARRIS	§
INTERNATIONAL LIMITED, ARRIS	§
GLOBAL LTD., ARRIS US HOLDINGS,	§ Civil Action 2:21-cv-310-JRG
INC., ARRIS SOLUTIONS, INC., ARRIS	§ (Lead Case)
TECHNOLOGY, INC., and ARRIS	§ ,
ENTERPRISES, LLC,	8
, ,	§
NOKIA CORP., NOKIA SOLUTIONS	<u> </u>
AND NETWORKS OY, and NOKIA OF	§ 61.11 A 11. N. 2.21 200 IDG
AMERICA CORP.	S Civil Action No. 2:21-cv-309-JRG
	(Member Case)
Defendants.	8
Detenuants.	8

DECLARATION OF EDWARD CHIN

- I, Edward Chin, hereby declare as follows:
- 1. I am a member of the Texas State Bar admitted to appear before this Court, and I am Of Counsel with The Davis Firm, P.C., counsel of record for plaintiff TQ Delta, LLC ("TQ Delta") in this lawsuit. I submit this declaration based on personal knowledge and following a reasonable investigation. If called upon as a witness, I could competently testify to the truth of each statement herein.

2.	In this case, TQ Delta has produced to Nokia	ı
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Case 2:21-cv-00310-JRG Document 117-1 Filed 04/20	0/22 Page 2 of 4 PageID #: 3224
3. Attached hereto as Exhibit A is a true and correct co	ppy of Denis J. G. Mestdagh & Paul
M. P. Spruyt, "A Method to Reduce the Probability of Clip	oping in DMT-Based Transceivers,"
IEEE TRANSACTIONS ON COMMUNICATIONS, VOL. 4	44, NO. 10 (1996).
4. Attached hereto as Exhibit B is a true and correct co	py of the LinkedIn profile for Denis
Mestdagh.	
5. Attached hereto as Exhibit C is a true and correct co	opy of the LinkedIn profile for Paul
Spruyt.	
6. Attached hereto as Exhibit D is a true and correct co	ppy of an email
This exhibit is designated as RESTRICTED – ATTORNEYS	3' EYES ONLY.
7. Attached hereto as Exhibit E is a true and corre	
7. Attached hereto as Eximple E is a true and corre	ст сору от
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	bit is designated as RESTRICTED –
ATTORNEYS' EYES ONLY.	

8. Attached hereto as **Exhibit F** is a true and correct copy of an email

This exhibit

9. Attached hereto as **Exhibit G** is a true and correct copy of an email

This exhibit is designated as RESTRICTED – ATTORNEYS' EYES ONLY.

is designated as RESTRICTED – ATTORNEYS' EYES ONLY.

- 10. Attached hereto as **Exhibit H** is a true and correct copy of Stefan H. Müller & Johannes B. Huber, "A Comparison of Peak Power Reduction Schemes for OFDM," GLOBECOM 97. IEEE GLOBAL TELECOMMUNICATIONS CONFERENCE (1997).
- 11. Attached hereto as **Exhibit I** is a true and correct copy of the LinkedIn profile for Stefan H. Müller.
 - 12. Attached hereto as **Exhibit J** is a true and correct copy of U.S. Patent No. 6,781,951.
- 13. Attached hereto as **Exhibit K** is a true and correct copy of ITU-T Recommendation G.712 (11/96).
- 14. Attached hereto as **Exhibit L** is a true and correct screenshot of https://www.itu.int/rec/T-REC-G.712-199611-S/en (accessed April 14, 2022).
- 15. Attached hereto as **Exhibit M** is a true and correct copy of screenshot of https://infocenter.nokia.com/public/7705SAR70R4A/index.jsp?topic=%2Fcom.sar.services%2Fh tml%2Fstandards.html (accessed April 13, 2022).
- 16. Attached hereto as **Exhibit N** is a true and correct copy of the Nokia 7705 data sheet, copyrighted 2020, downloaded from https://lightriver.com/wp-content/uploads/2020/09/nokia 7705 sar adapter cards rel20 data sheet en.pdf.

- 17. Attached hereto as **Exhibit O** is a true and correct copy of Alcatel 100 ADSL User Guide (https://www.manualslib.com/manual/3860/Alcatel-1000-Adsl.html, accessed April 13, 2022.
- 18. Attached hereto as **Exhibit P** is a true and correct copy of "End-to-End protocol stacks in the Alcatel 100 ADSL access network," https://ieeexplore.ieee.org/document/741250 (accessed April 13, 2022).
- 19. Attached hereto as **Exhibit Q** is a true and correct copy of at NOK00280509. This exhibit is designated as RESTRICTED ATTORNEYS' EYES ONLY.
- 20. Attached hereto as **Exhibit R** is a true and correct copy of **Exhibit R** NOK00280505. This exhibit is designated as RESTRICTED ATTORNEYS' EYES ONLY.
- 21. Attached hereto as **Exhibit S** is a true and correct copy of a NOK00280486. This exhibit is designated as RESTRICTED ATTORNEYS' EYES ONLY.
- 22. Attached hereto as **Exhibit T** is a true and correct copy of excerpts from the cover pleading of Nokia's Invalidity Contentions (served January 13, 2022) at pp. 10-13, 117-120; 222-223.

Executed on the 15th day of April 2022, at Southlake, Texas.

/s/ Edward Chin EDWARD CHIN